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6 Attorneys for Representative Plaintiff  
 and the Plaintiff Class

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

11 ROBERT RUNNINGS, individually, and  
 on behalf of all others similarly situated,

12 Plaintiffs,

13 vs.

14 DOLLAR TREE STORES, INC.

15 Defendant.

**Case No.: C-07-4012 SC**

**CLASS ACTION**

**DECLARATION OF CARRIE S. LIN, ESQ.  
 IN SUPPORT OF OPPOSITION TO  
 DEFENDANT'S MOTION FOR SUMMARY  
 JUDGMENT**

Date: March 21, 2008  
 Time: 10:00 a.m.  
 Judge: Hon. Samuel Conti  
 Courtroom: 1, 17th Floor

18 MIGUEL A. CRUZ and JOHN D.  
 19 HANSEN, individually, and on behalf  
 of all others similarly situated,

20 Plaintiffs,

21 vs.

22 DOLLAR TREE STORES, INC.

23 Defendant.

**Case No.: C-07-02050 SC (Consolidated Action)**

**CLASS ACTION**

SCOTT COLE & ASSOCIATES, APC  
 ATTORNEYS AT LAW  
 THE WACHOVIA TOWER  
 1970 BROADWAY, NINTH FLOOR  
 OAKLAND, CA 94612  
 TEL: (510) 891-9800

1 I, CARRIE S. LIN, declare:

2 1. I am an attorney-at-law, licensed to practice in the Northern District Court, and am  
3 an associate at the law offices of Scott Cole & Associates, APC, attorneys-of-record for plaintiff  
4 Robert Runnings and the Plaintiff Class in the above-entitled proceeding. I make these statements  
5 based on personal knowledge, and would so testify if called as a witness and have personal  
6 knowledge of the following.

7 2. Attached hereto as Exhibit "A" is a true and correct copy of this Court's November  
8 16, 2007 Minute Order. *See also*, Dckt No. 44.

9 3. Attached hereto as Exhibit "B" are true and correct copies of plaintiff Robert  
10 Runnings' ("Plaintiff") Special Interrogatories and Requests for Production of Documents, which  
11 were served on December 13, 2007.

12 4. Attached hereto as Exhibit "C" is a true and correct copy of Defendant's counsel's  
13 January 10, 2008 email requesting an extension of time to serve responses to the foregoing discovery  
14 requests.

15 5. Attached hereto as Exhibit "D" is a true and correct copy of Defendant's January 29,  
16 2008 discovery responses.

17 6. I repeatedly attempted to meet and confer regarding deficiencies in Defendant's  
18 discovery responses. These efforts failed to resolve the disputes.

19 7. On February 18, 2008 and February 25, 2008, Dollar Tree supplemented certain of  
20 its discovery responses relating to the individual representative plaintiffs.

21 8. Attached hereto as Exhibit "E" is a true and correct copy of this Court's February 15,  
22 2008 Order setting a briefing schedule for the instant Motion. *See also*, Dckt. No. 48.

23 9. Attached hereto as Exhibit "F" is a true and correct copy of excerpts from the  
24 transcript of the December 17, 2007 Deposition of Robert Runnings.

25 10. Attached hereto as Exhibit "G" is a true and correct copy of excerpts from the  
26 transcript of the October 12, 2007 Deposition of Miguel A. Cruz.

27 11. Attached hereto as Exhibit "H" is a true and correct copy of excerpts from the  
28 transcript of the October 11, 2007 Deposition of John D. Hansen.

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TEL: (510) 891-9800

1 12. Attached hereto as Exhibit "I" is a true and correct copy of excerpts from the  
2 transcript of the November 13, 2007 Deposition of Richard A. Tellstrom.

3  
4 I declare under penalty of perjury, under the laws of the State of California and of the United  
5 States, that the foregoing is true and correct, is based completely on personal knowledge and if called  
6 as a witness I could and would competently testify thereto.

7  
8 Executed on this 29th day of February 2008, at Oakland, California.

9  
10 /s/Carrie S. Lin  
11 Carrie S. Lin, Esq.  
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